REMARKS

The Office Action dated October 19, 2005, has been received and carefully noted. The following remarks are submitted as a full and complete response thereto.

Claims 60-89 are currently pending in the application, of which claims 60 and 74 are independent claims. Claims 60-89 are respectfully submitted for consideration and allowance in view of the remarks set forth below.

Rejections under 35 U.S.C. 103(a)

Claims 60-63, 66, 68, 70, 72-77, 80, 82, 84, and 86-89 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Application Publication No. 2003/0212800 of Jones et al. ("Jones") in view of U.S. Patent Application Publication No. 2003/0005132 of Ngyuen et al. ("Nguyen"). The Office Action takes the position that Jones teaches all of the elements of independent claims 60 and 74 except "multiple service processing entities within each network to specifically select among." The Office Action asserts that Nguyen remedies these deficiencies. Applicants respectfully traverse this rejection.

Independent claim 60, upon which claims 61-73 and 88 depend, is directed to a method for provisioning services to a terminal, which terminal is adapted to perform communication via at least one communication network, each network being equipped with service processing entities. The method includes requesting, by the terminal, a

specified service to be at a disposition of the requesting terminal. The method also includes analyzing the request by an analyzing entity associated with the at least one communication network. The method further includes deciding, by the analyzing entity, that the requested specified service is associated with a specific one of the service processing entities of a specific one of the at least one communication network. The method additionally includes, in response to the decision, routing communication messages associated with the terminal via the analyzing entity to the specified service processing entity with the specified communication network.

Independent claim 74, upon which claims 75-87 and 89 depend, is directed to a system for provisioning services to a terminal, which terminal is adapted to perform communication via at least one communication network, each network being equipped with service processing entities. The system includes means, at the terminal, for requesting a specified service to be at a disposition of the requesting terminal. The system also includes an analyzing entity associated with the at least one communication network for analyzing the request. The system further includes means, at the analyzing entity, for deciding that the requested specified service is associated with a specific one of the service processing entities of a specific one of the at least one communication network. The system additionally includes means, responsive to the decision, for routing communication messages associated with the terminal via the analyzing entity to the specified service processing entity with the specified communication network.

It is respectfully submitted that Jones and Nguyen, whether viewed in combination or singly, do not teach all of the elements of any of the presently pending claims.

Jones is directed to a method and system for allowing multiple service providers to serve users via a common access network. In Jones, the authentication request is sent to an authentication entity of a designated service provider. Such authentication entity is, however, not comparable to the claimed analyzing entity.

As claimed in claims 60 and 74, an analyzing entity is associated to at least one network, which suggests that it can be associated with a plurality of networks. In short, the analyzing entity, if the terminal is adapted to communicate via a plurality of communication networks, is associated with that plurality of communication networks. In contrast, in Jones, plural authentication entities exist and each is associated to a specific service provider, as opposed to being associated with the network itself. Thus, it is respectfully submitted that the Office Action is mistaken in understanding the authentication entity of Jones as corresponding with the claimed authentication entity. Accordingly, Jones does not teach or suggest at least these features of the claims.

Furthermore, claims 60 and 74 recite "deciding ... that said requested specified service is associated with a specific one of said service processing entities of a specific one of said at least one communication network." However, in Jones, a plurality of service providers may offer the same services. Accordingly, designating a specific service provider (in Jones) does not necessarily designate unambiguously a specified service. Thus, Jones is unable to decide "that said requested specified service is

associated with a specific one of said service processing entities of a specific one of said at least one communication network." Therefore, as well, Jones does not teach "requesting ... a specified service to be at a disposition of said requesting terminal" as claimed in Claims 60 and 74, because requesting a network does not necessarily correlate to selecting a particular service. The Office Action cites entities 114, but an examination of Figure 3 and the corresponding description in the specification makes it clear that entity 114 serves to compose authentication requests to be sent to entity 118, accordingly, there is ambiguity as to how the Office Action correlates entities 114 and 118 to the claimed analyzing entity. Thus, Jones does not teach or suggest at least these features of the claims.

Additionally, claims 60 and 74 recite "routing communication messages associated with said terminal via said analyzing entity to said specified service processing entity within said specified communication network." In contrast, Jones makes no such provision. Even assuming that entity 118 corresponds to the claimed analyzing entity (not admitted), there is no teaching that entity 118 routes the communication messages. Accordingly, Jones does not teach or suggest at least these features of the claims.

Accordingly, it can be seen from an examination of Jones, Figure 1, that there is only one policy enforcement point 18 present in the common access network. Thus, Jones does not permit each network to be equipped with plural service processing entities, wherein a service processing entity is a node handling the service, as defined in the specification and claims.

Thus, Jones has many more deficiencies with respect to the claims than simply failing to teach "multiple service processing entities within each network to specifically select among."

The Office Action cites Nguyen to cure the deficiencies of Jones, but the combination of Nguyen and Jones does not teach or suggest all of the elements of the claims.

Nguyen is directed to distributed service creation and distribution. Nguyen, in response to receiving a query for a particular service, identifies a provider of the particular service to the network connected device by a director service utility. The network connected device may then contact the service provider directly and receive an application (i.e. an executable file) for accessing the particular data network service.

Figure 9 and the corresponding portion of Nguyen's specification, paragraph 0068, help to clarify that an application such as VoIP is sent to the local telephone station apparatus (i.e. a terminal) where the application is received and executed. Thus, the service processing entity as a node handling the service is not present in Nguyen as the service requested is processed or executed at the terminal itself.

The Office Action refers to the presence of service clusters that are composed of service communities within which a plurality of service providers are present. However, such plurality of service providers does not constitute a service processing entity in the sense claimed in claims 60 and 74.

Accordingly, Nguyen does not remedy the deficiencies of Jones, and the combination of Jones and Nguyen fails to disclose or suggest the various elements mentioned above.

Claims 61-63, 66, 68, 72-73, and 88 depend from claim 60 and thus contain all the limitations of claim 60 and additional limitations. Claims 75-77, 80, 82, 84, 86-87, and 89 depend from claim 74 and thus contain all the limitations of claim 74 and additional limitations. Accordingly, it respectfully submitted that each of claims 61-63, 66, 68, 70, 72-74, 76-77, 80, 82, 84, and 86-89 recites subject matter that is neither disclosed nor suggested in the cited references.

Claims 64, 65, 71, 78, 79, and 85 were rejected under 35 U.S.C. 103(a) as being unpatentable over Jones and Nguyen in view of U.S. Patent Application Publication No. 2003/0041146 of Davis et al. ("Davis"). Applicants respectfully traverse this rejection.

Claims 65-65 and 71 depend from claim 60, and thus are patentable for at least the reasons claim 60 is patentable. Claims 78-79 and 85 depend from claim 74, and thus are patentable for at least the reasons claim 74 is patentable. Jones and Nguyen are discussed above. Davis does not remedy the deficiencies of Jones and Nguyen. Davis is directed to connection allocation technology. Davis aims to overcome network difficulties by providing intelligent, high speed connection allocation. Accordingly, Davis does not address the features described above, with respect to which Jones and Nguyen are deficient. Thus, it is respectfully requested that this rejection be withdrawn.

Claims 67, 69, 81, and 83 were rejected under 35 U.S.C. 103(a) as being unpatentable over Jones and Nguyen in view of U.S. Patent No. 6,687,356 of Glitho et al. ("Glitho"). Applicants respectfully traverse this rejection.
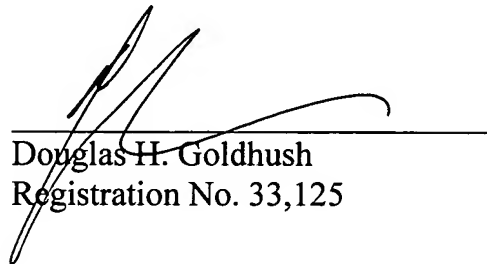
Claims 67 and 69 depend from claim 60, and thus are patentable for at least the reasons claim 60 is patentable. Claims 81 and 83 depend from claim 74, and thus are patentable for at least the reasons claim 74 is patentable. Jones and Nguyen are discussed above. Glitho does not remedy the deficiencies of Jones and Nguyen. Glitho is directed to a system and method for providing device-aware services in an integrated telecommunications network. Glitho aims to provide device-aware service provisioning for use in a hybrid or integrated telecommunications network having an IP-based PSN portion and one or more CSN portion such as a POTS portion. Accordingly, Glitho does not address the features described above, with respect to which Jones and Nguyen are deficient. Thus, it is respectfully requested that this rejection be withdrawn.

Conclusion

For the reasons described above, it is respectfully submitted that each of claims 60-89 recites subject matter that is neither disclosed nor suggested in the prior art. It is therefore respectfully requested that all of claims 60-89 be allowed, and that this application be passed to issue.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

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